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## WILLIAM J. SCOTT

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HAND DELIVERY

October 11, 1979

Richard Shandross  
U.S. E.P.A.  
Region V  
230 S. Dearborn Street  
Chicago, Illinois 60606

Re: People of the State of Illinois  
v. Steel Container Corp., et al.  
(Calumet Container Case)  
Case No. 79 CH 1953

Dear Mr. Shandross:

In accordance with our conversation and your request of October 3, 1979 we are providing herein an outline of the program we have proposed to assess the current and potential impact of operations and activities of Steel Container Corporation in Hammond, Indiana on ground and surface water pollution.

Potential for surface water pollution is of serious concern in light of the close proximity of Powder Horn Lake and Wolf Lake which lie to the southwest and northwest of the facility at an approximate distance of 1/8 mile. Immediately to the west of the site lies a large marshy area which flows directly into Powder Horn Lake. The marshy area is reportedly used as a spawning area for Powder Horn Lake. Powder Horn Lake and Wolf Lake\* are recreational lakes used for boating and fishing.

Preliminary surveys by the State of Indiana indicate that the upper 15 feet of glacial lacustrine deposits are expected to be high in hydraulic conductivity with permeabilities in the order of  $10^{-2}$  cm/sec. Preliminary surveys by the State of Indiana also indicated that the depth to the water table at the site ranges from 1 foot near the marsh area to about 4 feet in areas of high elevation. No samples nor other measurements or tests, however, have been taken to verify this information.

\* Wolf Lake is also used for swimming.

Soil and sludge samples as well as surface ponded water samples have been taken by the State of Illinois, State of Indiana and Steel Container's consultants. Most of the samples and the parameters that were analyzed showed varying degrees of contamination. The soil and sludge samples taken and analyzed by Indiana were shown to be very high in concentrations of lead, cadmium and benzene which are extremely toxic.

The analysis of sludge samples taken at the site by Steel Container's own consultants indicated that the concentration of selenium among other parameters was high and that selenium has a high mobility under reducing conditions. The State of Illinois samples indicated high concentrations of many parameters including total dissolved solids and oil and grease.

Recent excavations by a pipeline company, on the eastside of the Steel Container plant building uncovered the remains of buried steel drums and sludge deposits. On October 3, 1979 excavations by personnel of the Illinois Attorney General's Office and the Hammond Air Pollution Control Office and observed by yourself and Charlie Castle revealed that other areas as close as 75 feet from the marsh area have steel drums and sludge deposits buried in the ground. Sludge samples were taken for laboratory analysis.

The intended purpose of the proposed program is to:

1. Establish the hydraulic gradient to define the pattern of ground water movement.
2. Establish the depth from the surface to the water table.
3. Determine the chemical characteristics of the ground water on and adjacent to the site.
4. Define, if possible, the ground water pollution plume.
5. Delineate the potential for pollution of Powder Horn Lake and Wolf Lake.
6. Determine the depth of subsurface soil contamination.

The field work will consist of the following activities:

1. A series of soil borings on and adjacent to the site will be taken, and monitoring wells installed.

2. Selected soil samples will be taken for laboratory permeability tests.
3. Ground and surface water samples will be taken 3 times at 48 hour intervals.
4. The depth from the surface to the water table at and around the site will be measured.

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Laboratory analysis will include testing for those parameters found in previous sampling programs to have high mobility potential and high concentrations. These are:

1. Selenium
2. Lead and chromium
3. Total dissolved solids
4. Oil and grease

We have already secured the written permission of the adjacent land owners to have access to their properties and to perform the soil borings and to install the monitoring wells.

The cost of the program will include the services of technical consultants to analyze and interpret the data obtained from the field investigations, and to provide consultation to our office on matters relating to the work under this proposed program. At this time the scope of work does not include court testimony or attendance.

The estimated time schedule for this program is as follows:

- t=0 Authorization to proceed to consultant/contractor.
- 2 weeks Drilling of initial sampling and permeability determination.
- 3 weeks Final water sampling, additional drilling, water sampling no. 2, leaching studies, and water analysis.
- 5 weeks All water analyses completed.
- 7 weeks Report completed for presentation to the Attorney General's Office.

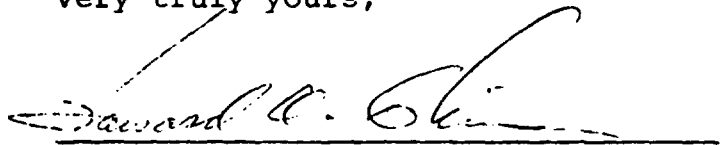
The estimated cost of the proposed program as described heretofore is \$13,500.00. This is the amount of funding we are requesting from the U.S. E.P.A. Again, we must emphasize that litigation is already pending against Steel Container Corporation and therefore the matters discussed in this letter are strictly

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confidential. Under no circumstances is this information to be released to any person other than authorized employees of the U.S. E.P.A. who are directly involved in consideration of this request.

Please advise us of your decision and if additional information is required.

Very truly yours,



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HOC:lab

cc: Douglas Karp  
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